



8280 Sheldon Road
Post Office Box 777
Channelview, Texas 77530
Tel 281 452 8888

August 20, 1997

Dr. C. W. Jameson
National Toxicology Program
Report on Carcinogenicity
P.O. Box 12233
Research Triangle Park, NC 27709

Dear Dr. Jameson,

Lyondell is responding to the Call for Public Comments issued in the Federal Register Notice of July 11, 1997. Specifically we are providing comment and information regarding Sulfuric Acid Mist which has been nominated for consideration of listing in the Ninth Report on carcinogens.

We support the opinion of the Chemical Manufacturers Association-Inorganic Acid Mists (CMA-IAM) Panel and the scientific experts that it has consulted, that the scientific information available on Sulfuric Acid Mist is inadequate to conclude that Sulfuric Acid Mist is either a known human carcinogen, or that it can be reasonably suspected to be a human carcinogen.

The CMA-IAM Panel suspects that the nomination of sulfuric acid mist is based on the listing by the International Agency for Research on Cancer (IARC) of "occupational exposure to strong inorganic acid mist containing sulfuric acid" as a known human carcinogen and/or the listing of the American Conference of Governmental Industrial Hygienists (ACGIH) of "sulfuric acid contained in strong inorganic acid mists" as a suspect human carcinogen. The Panel believes the review by IARC was flawed. The Panel further believes that the ACGIH classification was based only on a cursory review of the IARC data and was approved by their Dust and Inorganics Subcommittee and their full TLV® Committee without review of the information by the members of the subcommittee and committee.

We therefore urge you to carefully consider the comments of the CMA-IAM Panel and conclude that the evidence does not support listing Sulfuric Acid Mist as either a known or reasonably anticipated human carcinogen.

Sincerely,


William F. Thompson
Site Manager